

Exhibit 16

AFFIDAVIT and DECLARATION OF ANNA M. DURBIN

ANNA M. DURBIN, being duly sworn or affirming, declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a resident of Ardmore, Lower Merion Township, Pennsylvania, in Montgomery County.
2. I voted in the 2016 general election in my precinct, LM 8-2.
3. I voted on an electronic voting machine that had no paper receipt for me to review, so I cannot be sure that my vote was accurately recorded or counted.
4. I am an attorney and I work out of my law office in Ardmore, PA, in both Pennsylvania and Federal Courts.
5. When voting in the November 8, 2016 election I encountered the following problems: There was a red light on my screen that said something to the effect: "I do not wish to cast a vote." I pushed the button to turn it off. It did not turn off, but all of the choices I had made on the touch screen were erased. I went back and put in all my choices again. Then I hit the cast my vote button. I am concerned that this red light may have been a sign of a glitch that may have caused my votes not to be recorded. I am informed and believe that there was a very high number of "no votes cast" recorded in several precincts in Montgomery County, compared to prior elections. With no paper record to verify that the vote was recorded, I have concerns about the integrity of our voting system in Montgomery County. I understand that experts have demonstrated how electronic devices outside of polling places can be used to hack the machines, as well as software implanted to cause discrepancies.
6. I attempted to file a petition for recount/re-canvass with my county Board of Elections and encountered the following problems: I sent the petition with a person who had two

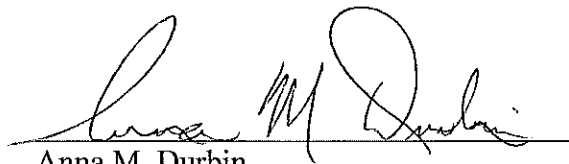
other affidavits from my precinct for them to be filed with the Montgomery County Board of Elections in Norristown, Pennsylvania. According to news released from Montgomery County Board of Elections, they refused to file those petitions, but insisted they be filed in Court, despite my understanding of what the law of Pennsylvania provided. I attempted to file a petition for recount/re canvass with my county Prothonotary, through others present in the Courthouse, and encountered the following problems: I have been informed and believe that my petition was filed and a filing fee was paid, but the petitions were dismissed. It is unfair that such a high filing fee be required for each person trying to file a petition for recount/re-canvass, and that three petitions with affidavits from each precinct are required. This makes the system unworkable. The Court notified me in writing of a hearing scheduled for November 30, 2016, but mailed it to an address which contained my street address, but not Ardmore, my post office, but instead Montgomery County, PA. I received it on Saturday, December 3, 2016. I am informed and believe that the Montgomery County Court of Common Pleas found the petitions were untimely, even though the Board of Elections had not certified the vote count before the petitions were filed. This procedure makes it impossible for voters to have input when there are problems.

7. I am also concerned about whether absentee ballots were timely made available to people who could not vote on Election Day in their precinct. I am informed and believe that college students who had timely requested absentee ballots did not receive them in time to vote. Since time was extended for absentee ballots to be returned in person to Norristown by the end of Election Day, I believe they could not be counted in the individual precincts. I do not know if they were counted.

8. I am concerned that my vote and the votes of my fellow citizens were not counted accurately in the election, and would like a manual recount of every paper ballot and a forensic

examination of the electronic voting systems in Pennsylvania to make sure the vote had integrity and every vote counted.

Dated: December 4, 2016



Anna M. Durbin